

**REMARKS**

Applicants respectfully request further examination and reconsideration in view of the above amendments and arguments set forth fully below. Claims 1, 2, 4, 6, 12, 14, 16, 19-20 and 25-33 were previously pending in the instant application. Within the Office Action, Claims 1, 2, 4, 6, 12, 14, 16, 19, 20 and 28-30 have been allowed, Claims 25-27, 31 and 33 have been rejected and Claim 32 has been objected to. By way of the above amendments, Claims 20, 25, 26, 27, 31 and 33 have been amended and Claim 32 has been canceled. Accordingly, Claims 1, 2, 4, 6, 12, 14, 16, 19-20, 25-31 and 33 are now pending in this application.

**Objection to Claims:**

Within the Office Action Claims 20, 26, 27 and 31 have been objected to for a number of informalities. By way of the above amendments, Claims 20, 26, 27 and 31 have been amended to correct the informalities outlined within the Office Action.

**Rejections Under 35 U.S.C. §§ 102(e) and (a)**

Within the Office Action Claims 31 and 33 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Publication No. 2004/0154112 to Braun (hereafter, "Braun").

Claim 31 has been amended to include the limitations of Claim 32, which has been objected to for depending from a rejected base claim, but was otherwise held allowable. Accordingly Claim 31 is now in condition for allowance.

Claim 33 has been further amended to positively recite a motorized handle and regions that automatically move independently while coupled to the motorized handle and while the motorized handle is stationary. Thus, making it abundantly clear that the movement or motion of the regions or sections is not the result of manual movement or manual manipulation of a handle.

Braun clearly only teaches a single region that moves. The region includes a squeegee and bristles that automatically and simultaneously move together in the same direction with the same motion. While it is true that a separate motion can be generated or imparted to the single region taught by Braun through manual manipulation of an attached handle, this is clearly neither independent (separately from other portions of the device) or automatic (without manual

manipulation of the attached handle), such as recited in independent Claim 33. For at least these reasons, the independent Claim 33 is allowable over the teachings of Braun.

Within the Office Action Claim 25 has been rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Publication No. 2003/0196283 to Eliav (hereafter, “Eliav”).

5           Applicant respectfully disagrees for the following reasons. Specifically, Eliav fails to teach a separate second region with a squeegee and bristles. Eliav teaches a section with a plurality of wiping elements that are directly coupled through a living hinge and, therefore, are not separate. The other section of the device taught by Eliav only has bristles. For at least these reasons, the independent Claim 25 is allowable over the teachings of Eliav.

10           Within the Office Action, Claims 25 and 26 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2002/0152564 to Blaustien (hereafter, “Blaustien”). Applicant respectfully disagrees with the rejection of Claims 25 and 26 based on the teachings of Blaustien for the following reasons.

15           Blaustien teaches that “the moving portion 320 includes bristles 324 and massaging tips 325. The static portion 322 includes bristles 326 and massaging tips 327. Blaustien also teaches that the massaging tips can be located anywhere among the bristles of the moving portion 320 and the static portion 322. [Blaustien; paragraph 0105] However, Blaustien fails to teach or suggest elongated wiping structures that have been described and claimed as “squeegees.” Squeegees, by definition, have elongated walls that protrude upward from a support surface to  
20           define or form a corresponding elongated wiping edge. The squeegees are thicker in the elongated direction than in wall thicknesses.

25           It appears that in the rejection of Claims 25 and 26 based on Blaustien, the Examiner equates the terms massaging tips, referred to herein as nodules, and squeegees. By way of the above amendment, Claims 25 and 26 have been amended to further recite structural differences between squeegees and nodules, or massaging tips. Also, by way of the above amendment, the Specification has been amended to further support these differences by including text from U.S. Patent Application No. 09/957,302, filed September 19, 2001, and titled “DEVICE WITH MULTI-STRUCTURAL CONTACT ELEMENTS,” the contents of which have been incorporated by reference in the present Application.

**Rejections Under 35 U.S.C. § 103(a)**

Within the Office Action, Claim 27 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Blaustien.

Claim 27 depends from the independent Claim 26. For all the reasons stated above, the independent Claim 26 is allowable over the teachings of Blaustien. Accordingly, Claim 27 is also allowable as depending from an allowable base claim.

For the reasons given above, Applicants respectfully submit that Claims 1, 2, 4, 6, 12, 14, 16, 19-20, 25-31 and 33 are now in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,

HAVERSTOCK & OWENS LLP

Dated: 9/27/2006

By: 

James A. Gavney Jr.

Reg. No. 45,687

Agent for Applicant(s)

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HAVERSTOCK & OWENS LLP.

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